McCulloch Kleinman

August 23, 2024

VIA ECF

Hon. Andrew L. Carter, Jr. United States District Court Southern District of New York 40 Foley Square New York, NY 1007 USDC SDNY DOCUMENT ELECTRONICALLY FILED

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DATE FILED: 8/26/2024

Re: Kee v. The Detroit Lions, Inc., et al., Case No. 1:24-cv-223 (ALC)

Judge Carter,

This firm represents Plaintiff Allen Kee ("Plaintiff") in the above-referenced matter. I write jointly with counsel for Defendant Timeless Creations, Inc.'s ("TCI") to request an extension of the current briefing deadlines for TCI's motion to dismiss. This is the parties' first request for an extension of these deadlines and is made with consent of both parties. The parties respectfully request the following changes to the briefing schedule:

Filing	Current Deadline	Proposed Deadline
TCI's motion deadline	August 26, 2024	September 9, 2024
Plaintiff's opposition deadline	September 9, 2024	October 7, 2024
TCI's reply deadline	September 16, 2024	October 14, 2024

HON, ANDREW L. CARTER, JR. UNITED STATES DISTRICT JUDGE

Dated: August 26, 2024

Respectfully submitted,

Kevin McCulloch, Esq. McCulloch Kleinman Law kevin@mkiplaw.com